

EXHIBIT 9

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

EXPERT REPORT OF HAROLD FURCHTGOTT-ROTH

September 22, 2023

I. Introduction

A. Qualifications

1. I am the president of Furchtgott-Roth Economic Enterprises. I am also a Senior Fellow at the Hudson Institute, where I founded the Center for the Economics of the Internet and cofounded the Forum for Intellectual Property. I am an adjunct professor of law at Brooklyn Law School where I teach communications law, and an adjunct professor of law at the University of Baltimore where I teach law and economics. I have advised and consulted for many businesses in the communications sector.
2. I served as the Commissioner of the Federal Communications Commission (“FCC” or “Commission”) from November 1997 through May 2001. In that capacity, I participated in all decisions of the Commission, including those relating to enforcement and to

consumer protection. I have delivered testimony before several Congressional committees relating to the work of the FCC.

3. From 1995 to 1997, I was chief economist of the U.S. House of Representatives Committee on Commerce. One of my responsibilities was to serve as a principal staff member helping to draft the Telecommunications Act of 1996.
4. From June 2001 through March 2003, I was a visiting fellow at the American Enterprise Institute for Public Policy Research (“AEI”) in Washington, DC. There I authored a book entitled: *A Tough Act to Follow?: The Telecommunications Act of 1996 and the Separation of Powers*.
5. From 1988 to 1995, I served as a senior economist at Economists Incorporated, where I worked on econometric matters in regulatory, antitrust, and commercial litigation cases.
6. My academic research concerns a variety of topics related to economics and regulation. I am the author or co-author of four books on cable television, telecommunications, and international trade, and I have published many scholarly and popular articles.
7. I received a Ph.D. in economics from Stanford University and an S.B. in economics from the Massachusetts Institute of Technology.
8. I have consulted extensively in the communications sector, including on FCC enforcement matters. As an FCC commissioner, as an economic consultant, and in other capacities, I have written about and testified about competition, industrial organization, and intellectual property.
9. A copy of my curriculum vitae is attached hereto as Appendix A.
10. The opinions in this report are based on: my review and analysis of documents produced, and testimony offered, in the above-captioned lawsuit (the “Proceeding”); other publicly

available documents; my education; and my more than 35 years of experience as an economist, regulator, and consultant. The documents, testimony, and other evidence on which I have relied in formulating my opinions are referenced where pertinent in the footnotes of this report and are listed in Appendix B. I reserve the right to amend, supplement, or revise my opinions and to respond to assertions made by Plaintiffs' proffered experts.

11. I am being compensated in this action at my standard rate of \$950 per hour. My compensation is not dependent on my conclusions or on the outcome of this Proceeding.

B. Assignment

12. I have been asked by Counsel for QuoteWizard.com LLC ("QuoteWizard") to consider and evaluate, based on my professional knowledge and experience with the Federal Communications Commission and my professional knowledge and experience of how enforcement actions are considered at the FCC, the following questions:

- a. What is the legislative and regulatory background of Section 227(c) related to this proceeding?
- b. For purposes of Section 227, how does the FCC distinguish phone numbers that are residential from those that are at least in part used for business purposes?
- c. Does the FCC enforce and adjudicate complaints similar to the one raised in this Proceeding, and if so, what types of enforcement actions does the FCC make?
- d. In its enforcement actions under Section 227 similar to the complaint¹ in this Proceeding, does the FCC apply a strict liability standard?

¹ All references to the complaint in this Proceeding are to the operative, August 4, 2020 First Amended Class Action Complaint.

- e. In its enforcement actions under Section 227 similar to the complaint in this Proceeding, does the FCC consider steps that a party has taken to comply with FCC rules?
- f. In its enforcement actions under Section 227 similar to the complaint in this Proceeding, does the FCC examine “willfulness”?

C. Summary of Opinions

13. Based on my review of documents in this Proceeding, and my professional knowledge and experience, including as a former FCC commissioner, an economist, and an individual who has studied the wireless industry for more than a quarter of century, I reach the following conclusions:

- a. Congress passed Section 227(c) primarily to protect residential consumers, and the FCC has promulgated rules to implement it, particularly 47 CFR 64.1200;
- b. The FCC has sought to limit the applicability of 47 CFR 64.1200 to residential subscribers;
- c. The FCC has the authority to enforce its rules including 64.1200, and it has taken many enforcement actions against TCPA violators, including substantial forfeitures, in matters similar to the complaint in this Proceeding;
- d. In its enforcement actions under Section 227 similar to the complaint in this Proceeding, the FCC does not apply a strict liability standard;
- e. In its enforcement actions under Section 227 similar to the complaint in this Proceeding, the FCC considers steps that a party has taken to comply with FCC rules; and
- f. In its enforcement actions under Section 227 similar to the complaint in this Proceeding, the FCC considers and punishes “willfulness.”

II. Congress passed Section 227(c) primarily to protect residential consumers, and the FCC has promulgated rules to implement it, particularly 47 CFR 64.1200(c)

14. I understand from counsel that the complaint in this Proceeding alleges violations of

Section 227.² Congress passed the original Section 227 of the Communications Act in 1991.³ Public Law 102-243 has many findings regarding telephone marketing, most of which mention or are focused on concerns of residential consumers⁴ rather than business users.⁵ In Section 227(c), Congress delegated to the Commission the authority to promulgate rules governing telephone marketing, including rules related to the “Protection of Subscriber Privacy Rights.”⁶ A few points about Section 227(c) are worth emphasizing:

- Section 227(c) has no enforceable provisions independent of rules that the Commission would promulgate under it. Aggrieved parties must state a claim under specific rules adopted by the Commission, not based on Section 227(c) independent of those rules;
- Section 227(c)(1)(A) instructs the Commission to “initiate a rulemaking proceeding concerning the need to protect *residential telephone subscribers’ privacy rights*.” (emphasis added).
- No provision of Section 227 (c) instructs the Commission to promulgate rules to protect non-residential telephone subscribers’ privacy rights.

The FCC promulgated the first set of rules in September 1992, including 47 CFR 64.1200(c) to address Section 227(c).⁷

² First Amended Class Action Complaint, paragraph 1.

³ Public Law 102-243, [STATUTE-105-Pg2394.pdf \(govinfo.gov\)](#).

⁴ Ibid., Section 2, paragraphs (6) – (13).

⁵ Ibid., Section 2, paragraphs (14) - (15).

⁶ 47 U.S.C. 227(c).

⁷ 7 FCC Rcd 8751; *see* FCC 92-443.

15. In December 2003, Congress passed the “Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003.”⁸ That law, among other provisions, primarily instructs the Federal Trade Commission to regulate “commercial electronic mail messages,” which in the context of the findings section other provisions of the law appear to refer to e-mails.⁹ Only one section addresses the FCC, which is required to promulgate rules under TCPA that would accommodate wireless customers.¹⁰ The language addressing FCC authority does not mention text messages specifically but instead refers to “mobile service commercial messages” which are defined in terms of “commercial electronic mail messages.”¹¹ Those in turn are defined by statute as “any electronic mail message the primary purpose of which is the commercial advertisement or promotion of a

⁸ PL 108-187.

⁹ *Ibid.*, Sections 1-13.

¹⁰ *Ibid.*, Section 14(b) – (d), which state as follows:

The Federal Communications Commission, in consultation with the Federal Trade Commission, shall promulgate rules within 270 days to protect consumers from unwanted mobile service commercial messages. The Federal Communications Commission, in promulgating the rules, shall, to the extent consistent with subsection (c)—

(1) provide subscribers to commercial mobile services the ability to avoid receiving mobile service commercial messages unless the subscriber has provided express prior authorization to the sender, except as provided in paragraph (3);

(2) allow recipients of mobile service commercial messages to indicate electronically a desire not to receive future mobile service commercial messages from the sender;

(3) take into consideration, in determining whether to subject providers of commercial mobile services to paragraph (1), the relationship that exists between providers of such services and their subscribers, but if the Commission determines that such providers should not be subject to paragraph (1), the rules shall require such providers, in addition to complying with the other provisions of this Act, to allow subscribers to indicate a desire not to receive future mobile service commercial messages from the provider—

(A) at the time of subscribing to such service; and

(B) in any billing mechanism; and

(4) determine how a sender of mobile service commercial messages may comply with the provisions of this Act, considering the unique technical aspects, including the functional and character limitations, of devices that receive such messages.

(c) **OTHER FACTORS CONSIDERED.**—The Federal Communications Commission shall consider the ability of a sender of a commercial electronic mail message to reasonably determine that the message is a mobile service commercial message.

(d) **MOBILE SERVICE COMMERCIAL MESSAGE DEFINED.**—In this section, the term “mobile service commercial message” means a commercial electronic mail message that is transmitted directly to a wireless device that is utilized by a subscriber of commercial mobile service (as such term is defined in section 332(d) of the Communications Act of 1934 (47 U.S.C. 332(d))) in connection with such service.

¹¹ *Ibid.*, 14(d).

commercial product or service (including content on an Internet website operated for a commercial purpose).”¹² Text messaging was a relatively new application in 2003. The FCC reported that only “20 percent of all U.S. mobile telephone subscribers either sent or received a text message during the fourth quarter of 2002.”¹³ Of those 20 percent, only an “estimated 28 percent of SMS users were ‘frequent users,’ meaning they sent or received a message at least once a day.”¹⁴

16. In 2003, the FCC revised 47 CFR 64.1200.¹⁵ Although the revisions were based on the 1992 version of 47 CFR 64.1200, the Commission presented an entirely new version of 64.1200, and subsequent versions of the CFR cite only the 2003 version of 47 CFR 64.1200 as the original source.¹⁶ That rule has been amended several times by the FCC.¹⁷ The most substantial amendments were in 2006¹⁸ and 2012.¹⁹ Although text messaging has become quite popular since 2003, the Commission’s 64.1200 rule has never included the term “text message.” The rule mentions “wireless” only four times.²⁰

III. The FCC has sought to limit the applicability of 64.1200 to residential subscribers

17. Section 227(c) appears to be limited to “residential telephone subscribers” (which are mentioned once) and residential subscribers (which are mentioned twice). The word

¹² *Ibid.*, Section 3(2)(A).

¹³ FCC, Eighth Annual Commercial Mobile Radio Services Competition Report, June 26, 2003, paragraph 145. [FCC-03-150A1.pdf](#).

¹⁴ *Ibid.*

¹⁵ 68 FR 44143. FCC 03-153.

¹⁶ *See, e.g.*, 2020 version of CFR, Title 47, volume 3.

¹⁷ According to the 2020 version of the CFR, the amendments of 47 CFR 64.1200 through 2019 included: 68 FR 59131, Oct. 14, 2003; 69 FR 60316, Oct. 8, 2004; 70 FR 19337, Apr. 13, 2005; 71 FR 25977, May 3, 2006; 71 FR 56893, Sept. 28, 2006; 71 FR 75122, Dec. 14, 2006; 73 FR 40185, July 14, 2008; 77 FR 34246, June 11, 2012; 83 FR 1577, Jan. 12, 2018; 84 FR 10267, Mar. 20, 2019; 84 FR 11232, Mar. 26, 2019.

¹⁸ 71 FR 25977, May 3, 2006.

¹⁹ 77 FR 34246, June 11, 2012.

²⁰ Three times in 64.1200(a)(1)(iv) and once in 64.1200(e).

“residential” appears in several other provisions of the Communications Act but is never precisely defined, and does not apply easily in a wireless context.²¹

A. The concept of “residential subscriber” had a clear meaning in a wireline context in 1991

18. The term “residential subscriber” had a clear meaning in the era when telecommunications were primarily wireline services. The meaning of “residential subscriber” and related terms is less clear in the context of wireless services, and the statute is silent on this topic. The term “residential subscriber” and variants of the term based on “subscriber” are not defined, either in Section 227(c), elsewhere in Section 227, elsewhere in Title 47, or in 15 USC 6101.²² The term “residential subscriber” appears six times in Section 227,²³ and the term “residential telephone line” appears once.²⁴ In other sections of Title 47 in the context of telephone service, “residential subscriber” appears twice;²⁵ and “residential ratepayers” appears once;²⁶ “basic residential phone service” appears once;²⁷ “residential use” appears once;²⁸ “residential consumer markets” appears once;²⁹ “residential households” appears once;³⁰ “residential users” appears once;³¹ and “residential customer” appears once.³² None of these “residential” terms is defined in statute.

²¹ See, e.g., 47 U.S.C. 253, 271(c), 522, 531, 541, 1006, 1008, 1303, and 1304.

²² 15 U.S.C. 6101 is in part the “Do-Not-Call Implementation Act,” Pub. L. 108-10, 117 Stat. 557. This Act required the FCC and Federal Trade Commission to establish the Do Not Call List.

²³ Once in §227(a); three times in §227(c); twice in the Congressional Statement of findings in 1991.

²⁴ 227(b).

²⁵ Once in §254, once in 271,

²⁶ Once in §1006,

²⁷ Once in §1008.

²⁸ Once in §1303.

²⁹ *Ibid.*

³⁰ *Ibid.*

³¹ Once in §1304.

³² *Ibid.*

19. The term “residential subscriber” appears several times in 47 CFR 64.1200, which corresponds to Section 227, but the term is not defined in these rules.³³ Similarly, the term “residential telephone subscriber” appears six times in the rules, all in 64.1200. In an adjacent set of rules, the term “residential subscriber” is defined with wireline concepts that could not apply to wireless service,³⁴ but that definition does not necessarily apply to 64.1200. In the FCC rules are corresponding definitions of “business subscriber” that also apply to wireline customers, but which do not necessarily apply to 64.1200.³⁵ Some of these rules were promulgated while I was an FCC commissioner.
20. Rule 64.1200 does not mention “business” line or subscriber at all. In 1991 when the TCPA was initially enacted, there was a clear distinction between business lines and residential lines, concepts that were clearly demarcated for wireline services. Under FCC rules, business lines paid higher tariffs,³⁶ switched access line,³⁷ or Yellow Pages advertising.³⁸ In contrast, under FCC rules, a residential subscriber is one that pays a lower residential rate under local tariffs³⁹ or is not a business subscriber.

³³ Twice in 64.1200(d); three times in 64.1200(f).

³⁴ “Residential subscriber refers to a subscriber to telephone exchange service that is not a business subscriber.” 47 CFR.2309(d); *see* “A line shall be deemed to be a residential subscriber line if the subscriber pays a rate for such line that is described as a residential rate in the local exchange service tariff.” 47 CFR 69.152(g); *see also*: “Effective July 1, 1999, only one of the residential subscriber lines a price cap local exchange carrier provides to a location shall be deemed to be a primary residential line.” 47 CFR 69.152(h).

³⁵ *See, e.g.*, 47 CFR 64.2305 (b); 47 CFR 64.152(h).

³⁶ *See, e.g.*, 47 CFR 69.104, “A line shall be deemed to be a single line business line if the subscriber pays a rate that is not described as a residential rate in the local exchange service tariff and does not obtain more than one such line from a particular telephone company.”; *see also* CFR 69.152 “A line shall be deemed to be a single- line business subscriber line if the subscriber pays a rate that is not described as a residential rate in the local exchange service tariff...”

³⁷ *See, e.g.*, 47 CFR 51.5, “A business line is an incumbent LEC-owned switched access line used to serve a business customer, whether by the incumbent LEC itself or by a competitive LEC that leases the line from the incumbent LEC.”

³⁸ *See, e.g.*, 47 CFR 64.2305, “Business subscriber refers to a subscriber to telephone exchange service for businesses. ... In other circumstances, a primary advertising classification is the classification of a subscriber to telephone exchange service as a business subscriber.”

³⁹ *See, e.g.*, 47 CFR 69.152, “A line shall be deemed to be a residential subscriber line if the subscriber pays a rate for such line that is described as a residential rate in the local exchange service tariff.”

21. Although relatively clear in the context of purely wireline services, these distinctions between a residential subscriber and a business subscriber have never been clearly separated for wireless services. The FCC rules that define either business or residential customers and lines do not apply to wireless services. Wireless services do not have a local tariff, nor are wireless numbers typically listed in the equivalent of a Yellow Pages.
22. For wireline subscriptions, the distinction between a residential line and a business line was determined not by actual usage but entirely at the time that a subscription was initiated. A small business operating from home could use a “residential” line often or even primarily for business purposes but would not have a listing in the Yellow Pages. The line would still be a residential line. In contrast, an office worker who made primarily personal calls from the office would still have a business line, not a residential line.
23. Wireless subscriptions, the subject of this proceeding, grew in popularity in the 1990s and became ubiquitously available in the 2000s.⁴⁰ They did not fit neatly into the wireline categories of either residential subscriber or business subscriber. Wireless subscriptions had an entirely different regulatory treatment. Wireless services were regulated by the FCC but were not regulated by state regulators at all. Wireless subscriptions paid fees set by wireless carriers, whether the wireless user was a business, a non-profit, a school, or a residential consumer. Wireless numbers were not automatically listed in the White Pages or the Yellow Pages.⁴¹

⁴⁰ See, e.g., FCC, 16th Mobile Competition Report, released March 21, 2013, p. 279. [FCC-13-34A1 \(1\).pdf](#)

⁴¹ With number porting in the early 2000s, landline numbers could be ported to wireless service and vice versa. Consequently, with number porting, it was possible that some wireless numbers were listed in either White Pages or Yellow Pages.

24. Not only is there no formal regulatory distinction between a “business” and a “residential” wireless customer, there often is little or no practical difference. Although some employers purchase directly separate wireless subscriptions and phones for employees, many employers do not. Instead, many employers will instead reimburse employees for their wireless expenses, or simply assume that employees will provide those services themselves. For example, as I understand it, Mr. Mantha’s employer reimbursed him at least for some of his wireless expenses.⁴² At least from a regulatory and from a usage perspective, it would consequently make little sense to characterize Mr. Mantha’s subscription as entirely residential.

B. Any phone number, including a business number, may be registered on the Do Not Call List

25. In 2003, the Federal Trade Commission established a Do Not Call Registry to allow consumers to stop unwanted telemarketing calls by registering their telephone numbers.⁴³ The FTC’s Telemarketing Sales Rules are different from the FCC’s TCPA rules. The FTC Telemarketing Sales Rules use a different vocabulary that does not include “residential” or “wireless.” The 2003 FTC rules do not mention wireless or text messaging.⁴⁴ Subsequent FTC rules also do not mention wireless or text messaging.⁴⁵ At least the current version of the Do Not Call registry clearly allows registration of wireless phone numbers.⁴⁶ Thus, it is up to the discretion of the individual registering a phone

⁴² See Derek Pardon Deposition, Exhibit 2 - 312.1 Cell Phone Reimbursement – Perkins 4851-7499-4122; *see also* September 11, 2020 Derek Pardon Deposition Transcript, 59: 15-16 (“Absolutely, to be clear, it is a cell phone reimbursement policy.”); 60: 3-6 (“Essentially, it basically says, that it applies to people who have an authorized need for mobile device services, that we talked about earlier. And that we will reimburse them \$30 a month.”).

⁴³ See Telemarketing Sales Rule, Final Rule, Federal Trade Commission, 68 Fed. Reg. 4580 Jan. 29, 2003. [Federal Register :: Telemarketing Sales Rule](#). The rule was also subsequently recorded as 16 CFR 310.

⁴⁴ *Ibid.*

⁴⁵ 16 CFR 310.

⁴⁶ [National Do Not Call Registry](#), accessed September 18, 2023.

number as to whether the phone number is a residential number or not. An individual may register a phone number on the FTC's Do Not Call registry that is primarily, or even exclusively, used for business purposes. Rather than merely accepting the status of Do Not Call registration as a residential phone number, the FCC in enforcement actions has sought confirmation from individuals that their phone number is actually a residential line.⁴⁷ Citing the 2003 Order incorporating the Do Not Call Registry into the FCC's TCPA rules,⁴⁸ the FCC has explained that "consumers *may* register *wireless* numbers that are used for residential purposes." (emphasis added).⁴⁹

26. The Do-Not-Call Implementation Act separately required the FCC to adopt under Section 227 rules for the FTC's national Do Not Call List.⁵⁰ The 2003 law does not define residential subscribers or mention wireless services. The FCC expanded its rules 47 CFR 64.1200 to include provisions related to the FTC's Do Not Call List, although the FCC did not control use or maintenance of the Do Not Call List.⁵¹
27. In the same 2003 Order, the FCC established rules clarifying that 47 CFR 64.1200(c) and (d) apply to calls to wireless phones.⁵² In the order implementing new rules, but not in the new rules themselves, the FCC stated that its rules would apply to text messages as well as voice calls,⁵³ although the statute is silent on this matter. Much of the FCC's discussion of text messaging focused on the costs of unwanted text messages,⁵⁴ likely a much greater cost consideration in 2003 than in 2022.

⁴⁷ See e.g., [DA-18-984A1.pdf \(fcc.gov\)](#), paragraph 7 and fn 30; [DA-18-1291A1.pdf \(fcc.gov\)](#), paragraph 6 and fn 30; and [DA-19-772A1.pdf \(fcc.gov\)](#), paragraph 7.

⁴⁸ 2003 TCPA Order, 18 FCC Rcd at 14039, paragraph 36.

⁴⁹ See, e.g., FCC-21-35A1.pdf, fn 116; FCC-20-74A1.pdf, fn 95.

⁵⁰ Do-Not-Call Implementation Act, 15 USC 6153.

⁵¹ 2003 TCPA Order, 18 FCC Rcd at 14039.

⁵² 47 CFR 64.1200(e).

⁵³ 2003 TCPA Order, 18 FCC Rcd at 14039 paragraphs 165-166.

⁵⁴ *Ibid.*

C. The FCC has taken the position that determination of whether a phone number is a residential number is a fact-intensive inquiry

28. In some investigations involving wireless numbers, the FCC has taken the position that determination of whether a phone number is a residential or business line is a fact-intensive inquiry.⁵⁵ It is not sufficient for purposes of ascertaining that a wireless phone number on the Do Not Call List is necessarily a residential phone number; the FCC staff makes efforts to verify that numbers called on the Do Not Call list were actually residential phone numbers.⁵⁶

29. As I understand it, in this Proceeding there has been a dispute about whether Mr. Mantha's number is a residential number. Based on my review of FCC enforcement documents, which I review in more detail below, I have not found an exact precedent for a Commission decision about a telephone number that is used partly for business purposes and partly for personal purposes. But based on the FCC cases cited in fn 47, it is my opinion that the Commission would investigate the line Mr. Mantha, and other members of the proposed class, to determine if each line was a residential line for purposes of Section 227(c).

IV. The FCC has the authority to enforce its rules including 64.1200, and it has taken many enforcement actions against TCPA violators, including substantial forfeitures, in matters similar those in this proceeding

30. The FCC has the authority to enforce its rules including those promulgated under Section 227(c).⁵⁷ The FCC has an Enforcement Bureau and has taken many enforcement actions

⁵⁵ See fn 47.

⁵⁶ *Ibid.*

⁵⁷ See, e.g., 47 U.S.C. 151, "there is created a commission to be known as the 'Federal Communications Commission', which shall be constituted as hereinafter provided, and which shall execute and enforce the provisions of this chapter."

involving alleged violations of Section 227 including Section 227(c), similar to cases in this proceeding.

31. Because preliminary FCC investigations generate a file number that remains confidential until the Commission issues a formal order or notice regarding the investigation, it is impossible to know from outside the Commission exactly how many Section 227(c) investigations the agency has initiated, but it is clearly at least the many hundreds discussed below.

32. The FCC takes warning consumers and businesses about TCPA seriously. The FCC has many documents and links to help consumers and businesses avoid unwanted calls.

Documents include:

- how to stop unwanted calls;⁵⁸
- how to block unwanted calls;⁵⁹
- how to benefit from caller ID identification and block spoofed robocalls;⁶⁰ and
- the FCC's efforts to combat robocalls and spoofing.⁶¹

33. The FCC takes TCPA enforcement seriously. Robocalls, spoofing, and the Do Not Call List are "Hot Topics" at the Enforcement Bureau Home Page.⁶² The Bureau also has a public document that describes TCPA enforcement.⁶³ Updated on July 19, 2022, the document lists dozens of TCPA investigations that have led to public orders at the FCC since August 1, 2016. Separate FCC links have additional investigations for robocalls;⁶⁴

⁵⁸ [Stop Unwanted Robocalls and Texts | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/stop-unwanted-robocalls-and-texts).

⁵⁹ [Call Blocking Tools and Resources | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/call-blocking-tools-and-resources).

⁶⁰ [Combating Spoofed Robocalls with Caller ID Authentication | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/combatting-spoofed-robocalls-with-caller-id-authentication).

⁶¹ [The FCC's Push to Combat Robocalls & Spoofing | Federal Communications Commission](https://www.fcc.gov/the-fccs-push-to-combat-robocalls-spoofing).

⁶² [Enforcement | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/enforcement).

⁶³ [At Unwanted Communications: Robocalls, Caller ID Spoofing, and Do-Not-Call Registry | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/unwanted-communications-robocalls-caller-id-spoofing-and-do-not-call-registry).

⁶⁴ [Telecommunications Consumers Division - Robocall \(fcc.gov\)](https://www.fcc.gov/telecommunications-consumers-division-robocall).

the Do Not Call List;⁶⁵ telephone solicitations;⁶⁶ unsolicited faxes;⁶⁷ and other TCPA issues.⁶⁸ The FCC is quite capable of imposing large penalties for violations of Section 227(c), and it has imposed forfeitures as large as nearly \$300 million for such TCPA violations.⁶⁹

34. This proceeding specifically involves text messages and Section 227(c), or CFR

64.1200(c).⁷⁰ I have been asked by counsel to review the publicly available FCC cases that involve Section 227(c) or CFR 64.1200(c). In Appendix C, I present a list of 571 such case documents since the Do Not Call rules were adopted in June 2003. I found these cases from three sources:

- a. Some documents can be found in a recent Enforcement Bureau document;⁷¹
- b. Some documents can be found in the Enforcement Bureau's list of Do Not Call violations;⁷² and
- c. Still other documents I found by searching the FCC's EDOCS site with a search term "robocall" in the Enforcement Bureau.⁷³

35. The documents in Appendix C fall into several categories.

- a. The vast majority of the documents listed in Appendix C are citations, a formal warning that the FCC issues regarding alleged rule violations.

⁶⁵ [Telecommunications Consumers Division - Do Not Call \(fcc.gov\)](https://www.fcc.gov/consumers/telecommunications).

⁶⁶ [Telecommunications Consumers Division - Telephone Solicitation \(fcc.gov\)](https://www.fcc.gov/consumers/telecommunications).

⁶⁷ [Telecommunications Consumers Division - Unsolicited Faxes \(fcc.gov\)](https://www.fcc.gov/consumers/telecommunications).

⁶⁸ [Telecommunications Consumers Division - Other - TCPA \(fcc.gov\)](https://www.fcc.gov/consumers/telecommunications).

⁶⁹ See [FCC Assesses Nearly \\$300M Forfeiture for Unlawful Robocalls | Federal Communications Commission](https://www.fcc.gov/news-releases/fcc-assesses-nearly-300m-forfeiture-for-unlawful-robocalls).

⁷⁰ First Amended Class Action Complaint, paragraphs 11, 50, 79, and 81.

⁷¹ At [Unwanted Communications: Robocalls, Caller ID Spoofing, and Do-Not-Call Registry | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/consumers/telecommunications).

⁷² [Telecommunications Consumers Division - Do Not Call \(fcc.gov\)](https://www.fcc.gov/consumers/telecommunications).

⁷³ [EDOCS | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/edocs).

- b. Fourteen are actual forfeiture orders, including a nearly \$300 million forfeiture order.⁷⁴
- c. Several are proposed forfeitures or notices of apparent liability.
- d. Six are consent decrees.
- e. Two are simply public notices.

V. In its enforcement actions under Section 227 similar to the complaint in this proceeding, the FCC does not apply a strict liability standard

36. In my experience, the FCC reserves for itself broad discretion to interpret federal communications law, to write rules to implement statutes, to take enforcement actions under those rules, and to apply penalties for the violations of those rules. In my experience as a commissioner and as an observer of the FCC for several decades, I cannot recall an instance when either: (1) the Commission had no choice but to find liability if certain circumstances were met; or (2) having found liability, the Commission had no discretion but to impose a certain strict liability penalty. Specifically stated in its authority to impose forfeitures is the Commission's discretion.⁷⁵ One can see the FCC deliberating on its discretion both in orders that impose substantial forfeitures⁷⁶ and in orders that do not impose forfeitures.⁷⁷ The Commission can and does take into account an entire set of factual circumstances in evaluating cases before it. Parties in disputes and

⁷⁴ See FCC Forfeiture Order, File No. EB-TCD-21-00031913, NAL Acct. No.: 202332170013, at [FCC Assesses Nearly \\$300M Forfeiture for Unlawful Robocalls | Federal Communications Commission](#), released August 3, 2023.

⁷⁵ See 47 U.S.C. 503(b)(2)(E) "(E) The amount of such forfeiture penalty shall be assessed by the Commission, or its designee, by written notice. In determining the amount of such a forfeiture penalty, the Commission or its designee shall take into account the nature, circumstances, extent, and gravity of the violation and, with respect to the violator, the degree of culpability, any history of prior offenses, ability to pay, and such other matters as justice may require."

⁷⁶ See, e.g., FCC, Forfeiture Order, File No.: EB-TCD-18-00027781, In the matter of John C. Spiller, et al, released March 18, 2021, [FCC Fines Telemarketer \\$225 Million for Spoofed Robocalls | Federal Communications Commission](#)

⁷⁷ See, e.g., Citation to Emanuel Hernandez, December 21, 2018, [Citation issued to Emanuel Manny Hernandez regarding sending telemarketing text messages to numbers on the Do-Not-Call registry](#)

in enforcement actions before the FCC present detailed information about intent, about steps taken to avoid violating Commission rules, and about a wide range of circumstances in order to inform FCC decisions on liabilities and on penalties. In my experience, the FCC frequently takes into account the following factors: prior conduct of parties; whether alleged misconduct was intentional or inadvertent; and whether there were efforts to withhold or to destroy information sought by the FCC.

37. The terms “strict liability” and “strictly liable” do not appear in either 47 U.S.C. or 47 CFR. The word “negligent” appears four times in 47 U.S.C., all in Section 1501 related to automatic dialing equipment and the Do-Not-Call registry of public safety answering points, but not the provisions at issue in this case. The word “negligent” appears four times in 47 CFR, all in Section 1.80(b)(7) and (8), in the context of 47 U.S.C. 1501.
38. For the FCC to find liability often is a lengthy process. Although the exact sequence varies by investigation, the Enforcement Bureau (or at times the full Commission) may issue some sequence of the following: a letter of inquiry, a hearing designation order to resolve disputed facts, a citation letter to the entity making an alleged infraction with an opportunity to halt the misconduct, a notice of apparent liability particularly if the misconduct is not halted, and a forfeiture notice (once liability has been determined). Parties under investigation by the Enforcement Bureau may proceed through the investigation with various possible outcomes, often resulting in no finding of liability. Investigations are time-consuming and costly, and some parties enter consent decrees with the Enforcement Bureau to end investigations without any findings of liability.

VI. In its enforcement actions under Section 227 similar to the complaint in this proceeding, the FCC considers steps that a party has taken to comply with FCC rules

39. Section 227 and the rules the FCC promulgated under it limit liability for entities that have attempted to comply with the statute and regulation. Section 227 emphasizes that due care in complying with FCC rules is an affirmative defense.⁷⁸ Moreover, 47 CFR 63.1200(c)(2) states exceptions to liability that are based on efforts to comply with FCC rules.⁷⁹ The FCC emphasizes similar ideas of limitations on liability on 47 CFR 63.1200(d).⁸⁰

⁷⁸ 47 U.S.C. 227(c)(5) “It shall be an affirmative defense in any action brought under this paragraph [227.(c)(5)] that the defendant has established and implemented, with due care, reasonable practices and procedures to effectively prevent telephone solicitations in violation of the regulations prescribed under this subsection.”

⁷⁹ 47 CFR 63.1200(c)(2),

Any person or entity making telephone solicitations (or on whose behalf telephone solicitations are made) will not be liable for violating this requirement if:

- (i) It can demonstrate that the violation is the result of error and that as part of its routine business practice, it meets the following standards:
 - (A) Written procedures. It has established and implemented written procedures to comply with the national do-not-call rules;
 - (B) Training of personnel. It has trained its personnel, and any entity assisting in its compliance, in procedures established pursuant to the national do-not-call rules;
 - (C) Recording. It has maintained and recorded a list of telephone numbers that the seller may not contact;
 - (D) Accessing the national do-not-call database. It uses a process to prevent telephone solicitations to any telephone number on any list established pursuant to the do-not-call rules, employing a version of the national do-not-call registry obtained from the administrator of the registry no more than 31 days prior to the date any call is made, and maintains records documenting this process.
 - (E) Purchasing the national do-not-call database. It uses a process to ensure that it does not sell, rent, lease, purchase or use the national do-not-call database, or any part thereof, for this section and any such state or federal law to prevent telephone solicitations to telephone numbers registered on the national database. It purchases access to the relevant do-not-call data from the administrator of the national database and does not participate in any arrangement to share the cost of accessing the national database, including any arrangement with telemarketers who may not divide the costs to access the national database among various client sellers; or
- (ii) It has obtained the subscriber’s prior express invitation or permission. Such permission must be evidenced by a signed, written agreement between the consumer and seller which states that the consumer agrees to be contacted by this seller and includes the telephone number to which the calls may be placed; or
- (iii) The telemarketer making the call has a personal relationship with the recipient of the call.

⁸⁰ No person or entity shall initiate any call for telemarketing purposes to a residential telephone subscriber unless such person or entity has instituted procedures for maintaining a list of persons who request not to receive telemarketing calls made by or on behalf of that person or entity. The procedures instituted must meet the following minimum standards:

- (1) Written policy. Persons or entities making calls for telemarketing purposes must have a written policy, available upon demand, for maintaining a do-not-call list.
- (2) Training of personnel engaged in telemarketing. Personnel engaged in any aspect of telemarketing must be informed and trained in the existence and use of the do-not-call list.

VII. In its enforcement actions under Section 227 similar to the complaint in this proceeding, the FCC considers and punishes “willfulness.”

40. Willfulness is the standard necessary for the FCC to impose a forfeiture.⁸¹ In each

forfeiture order in Appendix C, the FCC finds willfulness. In the absence of willfulness, the FCC does not impose forfeitures.

Respectfully submitted,


Harold Furchtgott-Roth
September 22, 2023

(3) Recording, disclosure of do-not-call requests. If a person or entity making a call for telemarketing purposes (or on whose behalf such a call is made) receives a request from a residential telephone subscriber not to receive calls from that person or entity, the person or entity must record the request and place the subscriber's name, if provided, and telephone number on the do-not-call list at the time the request is made. Persons or entities making calls for telemarketing purposes (or whose behalf such calls are made) must honor a residential subscriber's do-not-call request within a reasonable time from the date such request is made. This period may not exceed thirty days from the date of such request. If such requests are recorded or maintained by a party other than the person or entity on whose behalf the telemarketing call is made, the person or entity on whose behalf the telemarketing call is made will be liable for any failures to honor the do-not-call request. A person or entity making a call for telemarketing purposes must obtain a consumer's prior express permission to share or forward the consumer's request not to be called to a party other than the person or entity on whose behalf a telemarketing call is made or an affiliated entity.

(4) Identification of sellers and telemarketers. A person or entity making a call for telemarketing purposes must provide the called party with the name of the individual caller, the name of the person or entity on whose behalf the call is being made, and a telephone number or address at which the person or entity may be contacted. The telephone number provided may not be a 900 number or any other number for which charges exceed local or long distance transmission charges.

(5) Affiliated persons or entities. In the absence of a specific request by the subscriber to the contrary, a residential subscriber's do-not-call request shall apply to the particular business entity making the call (or on whose behalf a call is made), and will not apply to affiliated entities unless the consumer reasonably would expect them to be included given the identification of the caller and the product being advertised.

(6) Maintenance of do-not-call lists. A person or entity making calls for telemarketing purposes must maintain a record of a consumer's request not to receive further telemarketing calls. A do-not-call request must be honored for 5 years from the time the request is made.

(7) Tax-exempt nonprofit organizations are not required to comply with 64.1200(d).

⁸¹ 47 U.S.C. 503(b). “(1) Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have—

(A) *willfully* or repeatedly failed to comply substantially with the terms and conditions of any license, permit, certificate, or other instrument or authorization issued by the Commission;

(B) *willfully* or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter or under any treaty, convention, or other agreement to which the United States is a party and which is binding upon the United States; [Emphasis added in italics]

CERTIFICATE OF SERVICE

I, the undersigned, of the law offices of Nelson Mullins Riley and Scarborough LLP, attorneys for Defendant QuoteWizard.com, LLC do hereby certify that I have served all counsel of record with copies of this document by electronic mail.

Dated: September 22, 2023

/s/ Kevin P. Polansky
Kevin P. Polansky

Appendix A

Harold Furchtgott-Roth

Ph. D, Stanford University, Economics, 1986

S.B, Massachusetts Institute of Technology, 1978

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Chevy Chase, MD 20815
(301) 219-3904

Experience

2003–present	<i>Furchtgott-Roth Economic Enterprises:</i> President
2011–present	<i>Hudson Institute:</i> Senior Fellow; Founder and Director, Center for Economics of the Internet
2014–present	<i>Brooklyn Law School,</i> Adjunct Professor of Law, teaches class on Communications Law
2022- present	<i>University of Baltimore Law School,</i> Adjunct Professor of Law, teaches class on Law and Economics
2017–2019	<i>Utilicom Advisors, LLC:</i> Partner
2011–2012	<i>American Arbitration Association,</i> arbitrator, (File No. 50 125 T 00245 11), Macquarie Terminal Holdings LLC v. Voting Trust of IMTT Holdings Inc. and IMTT Holdings Inc.)
2004–2008	<i>New York Sun,</i> Business columnist
2001–2003	<i>American Enterprise Institute,</i> Visiting Fellow
1997–2001	<i>Federal Communications Commission,</i> Commissioner: One of five commissioners responsible for U.S. communications policy, rule making, enforcement, and adjudication. Among other responsibilities, reviewed all major mergers in communications sector. For statements, speeches, and other information, see: http://www.fcc.gov/commissioners/previouscommish.html
1995–1997	<i>U.S. House of Representatives, Committee on Commerce,</i> Chief Economist: One of the principal staff for the

Telecommunications Act of 1996, Balanced Budget Act of 1995, and electricity deregulation legislation for the 105th Congress.

1988-1995	<i>Economists Incorporated</i> , Senior Economist
1984-1988	<i>Center for Naval Analyses</i> , Research Analyst
1980-1983	<i>Stanford University</i> , Research Assistant, Teaching Assistant for public finance,
1981-1982	<i>U.S. Department of Energy, Conservation and Renewable Energy Program</i> , Research Assistant
Summer 1980	<i>Office of Management and Budget</i> , Intern
1978-1979	<i>Congressional Budget Office</i> , Assistant Analyst
Summer 1977	<i>U.S. Department of Labor, Pension and Welfare Benefits Program</i> , Intern
1976-1978	<i>MIT, Center for Transportation Studies</i> , Research Assistant
Summer 1976	<i>U.S. Senate Committee on Appropriations</i> , Internship sponsored by MIT Political Science Department

Education

1986	Stanford University, Ph.D. in Economics
1978	Massachusetts Institute of Technology, S.B. in Economics
1973-1974	University of South Carolina

Honors

1997-2001 groups	Awards for FCC achievements from various civic and business groups
Summer 1984	Visiting Fellow, University of Warwick
1983-1984	Research Fellow, Brookings Institution
1974	National Merit Scholar, Massachusetts Institute of Technology

Professional Societies

American Economics Association

Federalist Society

Boards

Corporate

2006-2009 MRV Communications

2006-2017 Oneida Broadband

Advisory Boards

2009 - present Catalyst Investors, Operating Partner

2012 – 2015 Telcare, Advisory Board

2017- 2018 Yippy, Advisory Board

2019-present Pacific Dataport, Advisory Board

2019-present Tachus, Advisory Board

2021-present WCO, Advisory Board and Vice Chairman

Advisory Committees

2003-2004 National Security Agency, Member of panel to support study, “Protecting the U.S. Telecommunications Infrastructure— The Way Forward”

2009-2016 Department of Commerce, Commerce Spectrum Management Advisory Committee

Other

2007 - present Hudson Institute, Senior Fellow

2003-present Washington Legal Foundation, Legal Policy Advisory Board

2005-2007 *Telecommunications Policy Research Conference:*
Chairman

2004-2008 Board Member

Books

A Tough Act To Follow? The Telecommunications Act of 1996 and the Separation of Powers, (Washington, DC: AEI Press), 2006.

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Appendix B

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15 U.S.C. 6101, 6153

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47 CFR 1.80

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[Telecommunications Consumers Division - Other - TCPA \(fcc.gov\).](#)

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Telemarketing Sales Rule, Final Rule, Federal Trade Commission, 68 Fed. Reg. 4580 Jan. 29, 2003. [Federal Register :: Telemarketing Sales Rule.](#)

[National Do Not Call Registry,](#)

Court documents

First Amended Class Action Complaint

312.1 Cell Phone Reimbursement – Perkins 4851-7499-4122

Deposition of Derek Pardon, September 11, 2020

FCC Enforcement documents

See Appendix C

Appendix C

FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
8/3/23	FCC Assesses Nearly \$300M Forfeiture for Unlawful Robocalls Federal Communications Commission	1
8/1/23	FCC Issues Robocall Cease-and-Desist Letter to One Owl Telecom Inc. Federal Communications Commission	
6/7/23	DOC-394134A1.pdf (fcc.gov)	
6/6/23	FCC Assesses Over \$5M Forfeiture for Unlawful Robocalls Federal Communications Commission	1
2/15/23	DOC-391103A1.pdf (fcc.gov)	
1/24/23	DOC-390811A1.pdf (fcc.gov)	
1/24/23	FCC Warns Providers About Robocalls from PhoneBurner and MV Realty Federal Communications Commission	
1/11/23	DOC-390624A1.pdf (fcc.gov)	
1/11/23	DOC-390625A1.pdf (fcc.gov)	
12/23/22	FCC Proposes Nearly \$300M Fine Against Auto Warranty Scam Robocaller Federal Communications Commission	
11/10/22	FCC Issues Robocall Cease-and-Desist Letter to Urth Access Federal Communications Commission	
7/14/22	FCC Proposes \$116M Robocall Fine for Toll-Free Traffic Pumping Scheme Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to Call Pipe Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to Fugle Telecom Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to Geist Telecom Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to Global Lynks Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to Mobi Telecom Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to South Dakota Telecom Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to SipKconnect Federal Communications Commission	
7/7/22	FCC Issues Robocall Cease-and-Desist Letter to Virtual Telecom Federal Communications Commission	
3/22/22	FCC Issues Robocall Cease-and-Desist Letter to Airespring Federal Communications Commission	
3/22/22	FCC Issues Robocall Cease-and-Desist Letter to Hello Hello Miami Federal Communications Commission	
3/22/22	https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-thing	
2/22/22	FCC Proposes \$45 Million Fine for Apparently Unlawful Robocalls Federal Communications Commission	
2/10/22	FCC Issues Robocall Cease-and-Desist Letter to Great Choice Telecom Federal Communications Commission	
2/10/22	FCC Issues Robocall Cease-and-Desist Letter to TCA Voip Federal Communications Commission	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
10/21/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Duratel LLC Federal Communications Commission</u>	
10/21/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Primo Dialler LLC Federal Communications Commission</u>	
10/21/21	<u>FCC Issues Robocall Cease-and-Desist Letter to PZ/Illum Federal Communications Commission</u>	
8/24/21	<u>Orders TOC by Paragraph.dot (fcc.gov)</u>	
5/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to VaultTel Solutions Federal Communications Commission</u>	
5/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Prestige DR VoIP Federal Communications Commission</u>	
4/13/21	<u>FCC Issues Robocall Cease-and-Desist Letter to R Squared Telecom LLC Federal Communications Commission</u>	
4/13/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Tellza Federal Communications Commission</u>	
3/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to IDT Corporation Federal Communications Commission</u>	
3/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Stratics Networks Federal Communications Commission</u>	
3/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Icon Global Services Federal Communications Commission</u>	
3/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to RSCOM Federal Communications Commission</u>	
3/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Third Rock Telecom Federal Communications Commission</u>	
3/18/21	<u>FCC Issues Robocall Cease-and-Desist Letter to Yodel Technologies Federal Communications Commission</u>	
3/18/21	<u>FCC Fines Telemarketer \$225 Million for Spoofed Robocalls Federal Communications Commission</u>	1
1/14/21	<u>FCC Fines Robocaller Scott Rhodes Nearly \$10M for Illegal Spoofing Federal Communications Commission</u>	1
11/19/20	<u>FCC Fines Telemarketer Nearly \$10 Million for Spoofed Robocalls Federal Communications Commission</u>	1
10/28/20	<u>FCC Fines Arizona Telemarketer \$37.5 Million for Spoofing Violations Federal Communications Commission</u>	1
6/10/20	<u>FCC Proposes Record \$225 Million Fine for 1 Billion Spoofed Robocalls Federal Communications Commission</u>	
11/27/19	<u>D&D Global, Sciarra, Prerecorded Messages Citation Federal Communications Commission (fcc.gov)</u>	
12/21/18	<u>Citation issued to Emanuel Manny Hernandez regarding sending telemarketing text messages to numbers on the Do-Not-Call registry</u>	
9/26/18	<u>Citation & Order issued to Affordable Enterprises of Arizona, LLC. regarding apparent violation of National Do-Not-Call Rules</u>	
9/26/18	<u>FCC Fines Robocaller \$82 Million for Illegally-Spoofed Calls Federal Communications Commission</u>	1

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
5/10/18	FCC Fines Massive Neighbor Spoofing Robocall Operation \$120 Million Federal Communications Commission	1
8/4/17	Best Insurance Contracts, Inc., and Philip Roesel NAL Federal Communications Commission (fcc.gov)	
7/26/17	FCC Releases Robocall Platform Fine Federal Communications Commission	1
6/2/17	FCC Proposes \$120M Fine On Robocaller For Illegal Spoofing Federal Communications Commission	
1/13/17	FCC Issues \$25,000 Fine For Caller ID Spoofing Federal Communications Commission	1
9/13/16	FCC Issues Citation to Manasseh Jordan for Robocalls to Cell Phones Federal Communications Commission	
8/2/16	FCC To Fine Two Men \$25,000 Each For Spoofing Caller ID Federal Communications Commission	
5/12/15	DOC-333875A1.pdf (fcc.gov)	
5/4/15	FCC Cites PoliticalRobocalls.com For Robocalls to Cell Phones Federal Communications Commission	
5/4/15	FCC Cites Phonevite For Robocalls to Cell Phones Federal Communications Commission	
3/24/15	Bureau Cites Robocaller for Failure to Respond to Inquiry Federal Communications Commission (fcc.gov)	
5/19/14	\$7,500,000 Consent Decree with Sprint Corporation f/k/a Sprint Nextel Corporation regarding Sprint's compliance with the Company-Specific Do-Not-Call rules	
5/8/14	FCC to Fine Online Co. \$2.9M for Political Robocalls to Cell Phones Federal Communications Commission	
3/15/13	Microsoft Word - 129189 (fcc.gov)	
11/18/11	Citation issued to PCS, Inc. regarding apparent violation of National Do-Not-Call Rules	
11/17/11	Citation issued to Resort Marketing Group regarding apparent violation of National Do-Not-Call Rules	
11/10/11	Citation issued to CDS Marketing regarding apparent violation of National Do-Not-Call Rules	
10/21/11	\$400,000 Consent Decree with Sprint Nextel Corporation regarding Sprint's compliance with the Company-Specific Do-Not-Call rules	
2/15/11	Citation issued to Adobe Air regarding apparent violation of National Do-Not-Call Rules	
10/20/10	Citation issued to Savantius, LLC regarding apparent violation of National Do-Not-Call Rules	
10/20/10	Citation issued to Global Management Advertising LLC regarding apparent violation of National Do-Not-Call Rules	
6/29/10	\$20,000 forfeiture against AZ Prime One Mortgage Corporation regarding violation of the National Do-Not-Call Rules	2
11/5/09	Citation issued to SVM, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/1/09	Citation issued to GlobalReach International Inc. regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
8/31/09	Citation issued to Vic's Mowing & Plumbing regarding apparent violation of National Do-Not-Call Rules	
8/31/09	Citation issued to Blackstone Lending Group aka 1st Columbia Bank regarding apparent violation of National Do-Not-Call Rules	
8/18/09	Citation issued to Commerce Planet, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/16/09	Citation issued to Service Experts regarding apparent violation of National Do-Not-Call Rules	
7/13/09	Citation issued to Alaskan Quality Services regarding apparent violation of National Do-Not-Call Rules	
7/1/09	Citation issued to Maine Window & Sunroom, Inc. aka True North Home Systems regarding apparent violation of National Do-Not-Call Rules	
7/1/09	Citation issued to G&C Carpet & Upholstery regarding apparent violation of National Do-Not-Call Rules	
7/1/09	Citation issued to CIN Productions regarding apparent violation of National Do-Not-Call Rules	
7/1/09	Citation issued to JMG Distribution aka Kirby Vacuums dba CT Kirby regarding apparent violation of National Do-Not-Call Rules	
6/22/09	Citation issued to Gold Crown Property Management regarding apparent violation of National Do-Not-Call Rules	
6/22/09	Citation issued to First Chiropractic regarding apparent violation of National Do-Not-Call Rules	
6/22/09	Citation issued to Adobe Carpet Cleaning regarding apparent violation of National Do-Not-Call Rules	
6/22/09	Citation issued to Desert Valley Aire regarding apparent violation of National Do-Not-Call Rules	
6/19/09	Citation issued to Kids First aka Family Feature Film regarding apparent violation of National Do-Not-Call Rules	
6/19/09	Citation issued to Atleads, LLC aka Elect Group regarding apparent violation of National Do-Not-Call Rules	
6/16/09	\$10,000 Forfeiture against AZ Prime One Mortgage Corporation regarding violation of the National Do-Not-Call Rules	1
6/15/09	Citation issued to Kevis Rejuvenation regarding apparent violation of National Do-Not-Call Rules	
6/15/09	Citation issued to Alliance Data Systems regarding apparent violation of National Do-Not-Call Rules	
6/5/09	Citation issued to Stain Masters regarding apparent violation of National Do-Not-Call Rules	
6/5/09	Citation issued to Gulf Coast Window Cleaning regarding apparent violation of National Do-Not-Call Rules	
6/5/09	Citation issued to Vinyl Window Broker, Inc. regarding apparent violation of National Do-Not-Call Rules	
6/5/09	Citation issued to Green Country Exteriors regarding apparent violation of National Do-Not-Call Rules	
6/2/09	Citation issued to Healstone Investment Real Estate, Inc. regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
5/20/09	Citation issued to Deborah Deiss dba Your Personal Assistant regarding apparent violation of National Do-Not-Call Rules	
5/20/09	Citation issued to Health Center, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/13/09	Citation issued to Classic Chevrolet regarding apparent violation of National Do-Not-Call Rules	
5/8/09	Citation issued to NBTB Travel dba NBTB, Inc. aka Nobody But The Best regarding apparent violation of National Do-Not-Call Rules	
5/7/09	Citation issued to First National Lending Corporation regarding apparent violation of National Do-Not-Call Rules	
5/7/09	Citation issued to B&J Resort/Worldnet regarding apparent violation of National Do-Not-Call Rules	
5/7/09	Citation issued to Direct Mortgage Exchange regarding apparent violation of National Do-Not-Call Rules	
4/30/09	Citation issued to TruGreen Chemlawn regarding apparent violation of National Do-Not-Call Rules	
4/22/09	Citation issued to Planet Travel regarding apparent violation of National Do-Not-Call Rules	
4/22/09	Citation issued to C&M Chevrolet & Geo regarding apparent violation of National Do-Not-Call Rules	
4/22/09	Citation issued to San Diego Door & Window Inc. regarding apparent violation of National Do-Not-Call Rules	
4/21/09	Citation issued to Coldstream Financial Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
4/21/09	Citation issued to Health Solutions & Associates, Inc. aka Health Florida regarding apparent violation of National Do-Not-Call Rules	
4/17/09	Citation issued to Media Synergy Group regarding apparent violation of National Do-Not-Call Rules	
4/15/09	Citation issued to Cool Air regarding apparent violation of National Do-Not-Call Rules	
4/10/09	Citation issued to E Marketing Services, Inc. aka EMS regarding apparent violation of National Do-Not-Call Rules	
4/7/09	Citation issued to First National Lending Corporation regarding apparent violation of National Do-Not-Call Rules	
4/7/09	Citation issued to B&J Resort/Worldnet regarding apparent violation of National Do-Not-Call Rules	
4/7/09	Citation issued to Direct Mortgage Exchange regarding apparent violation of National Do-Not-Call Rules	
4/6/09	Citation issued to Energy Exteriors regarding apparent violation of National Do-Not-Call Rules	
4/6/09	Citation issued to Atlantic Water Products regarding apparent violation of National Do-Not-Call Rules	
4/2/09	Citation issued to Investor's Business Daily, Inc. regarding apparent violation of National Do-Not-Call Rules	
4/1/09	Citation issued to The Firm - Loans, Insurance & Investments regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
4/1/09	Citation issued to Mohammed Kendesi aka Kendesi Club, LLC regarding apparent violation of National Do-Not-Call Rules	
4/1/09	Citation issued to Turn Key Solutions regarding apparent violation of National Do-Not-Call Rules	
4/1/09	Citation issued to Prime Time Window Cleaning Company regarding apparent violation of National Do-Not-Call Rules	
3/26/09	Citation issued to No Fuss Rental aka Ultimate Pedals regarding apparent violation of National Do-Not-Call Rules	
3/25/09	Citation issued to Studentcity.com regarding apparent violation of National Do-Not-Call Rules	
3/25/09	Citation issued to LeadTech, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/23/09	Citation issued to All Natural Carpet Cleaning aka All Natural Cleaning Services regarding apparent violation of National Do-Not-Call Rules	
3/23/09	Citation issued to Assurance Services regarding apparent violation of National Do-Not-Call Rules	
3/20/09	Citation issued to Hagler Enterprises, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/6/09	Citation issued to Mac One Group (Travel) regarding apparent violation of National Do-Not-Call Rules	
3/6/09	Citation issued to CSTR Solutions regarding apparent violation of National Do-Not-Call Rules	
2/18/09	Citation issued to Imperial Finance regarding apparent violation of National Do-Not-Call Rules	
2/11/09	Citation issued to Better Business Travel regarding apparent violation of National Do-Not-Call Rules	
2/11/09	Citation issued to Rose Call Solutions regarding apparent violation of National Do-Not-Call Rules	
2/5/09	Citation issued to Home Care Remodeling, Inc. regarding apparent violation of National Do-Not-Call Rules	
2/2/09	Citation issued to Omni Financial Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
1/29/09	Citation issued to Global Time Share Solutions, Inc. regarding apparent violation of National Do-Not-Call Rules	
1/23/09	Citation issued to Federated Payment Systems, LLC regarding apparent violation of National Do-Not-Call Rules	
1/14/09	Citation issued to All State Products, Inc. regarding apparent violation of National Do-Not-Call Rules	
1/14/09	Citation issued to Market Probe aka Market Horizons regarding apparent violation of National Do-Not-Call Rules	
1/14/09	Citation issued to Fremont Weed Limited Partnership dba Hogs & Honeys regarding apparent violation of National Do-Not-Call Rules	
1/14/09	Citation issued to Spyglass Equity Systems regarding apparent violation of National Do-Not-Call Rules	
1/14/09	Citation issued to DRG Telemarketing regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
12/29/08	Citation issued to Citibank aka CitiCards regarding apparent violation of National Do-Not-Call Rules	
12/29/08	Citation issued to Equity Exterior, Inc. regarding apparent violation of National Do-Not-Call Rules	
12/23/08	Citation issued to Bank One Services Corporation aka First USA Bank One regarding apparent violation of National Do-Not-Call Rules	
12/9/08	Citation issued to Choice Exploration, Inc. regarding apparent violation of National Do-Not-Call Rules	
12/3/08	Citation issued to Cleaning Experts regarding apparent violation of National Do-Not-Call Rules	
11/25/08	Citation issued to Reliable Telecard Corporation regarding apparent violation of National Do-Not-Call Rules	
11/25/08	Citation issued to Reliable Telecard Corporation regarding apparent violation of National Do-Not-Call Rules	
11/21/08	Citation issued to All Pro Chimney regarding apparent violation of National Do-Not-Call Rules	
11/21/08	Citation issued to All Pro Chimney regarding apparent violation of National Do-Not-Call Rules	
11/13/08	Citation issued to Debt Relief Systems, Inc. dba Debt Sytems Relief, Inc. regarding apparent violation of National Do-Not-Call Rules	
11/10/08	Citation issued to A.I. Construction West Florida, LLC regarding apparent violation of National Do-Not-Call Rules	
11/4/08	Citation issued to Spirit Capitol Group, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/30/08	Citation issued to Integrity Title Agency, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/30/08	Citation issued to Integrity Title Agency, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/28/08	Citation issued to Rockwell Capital Corporation dba Rockwell Financial Group, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/28/08	Citation issued to Aduddell Group Mortgage regarding apparent violation of National Do-Not-Call Rules	
10/28/08	Citation issued to Rockwell Capital Corporation dba Rockwell Financial Group, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/28/08	Citation issued to Aduddell Group Mortgage regarding apparent violation of National Do-Not-Call Rules	
10/23/08	Citation issued to Pro Tech Inspection regarding apparent violation of National Do-Not-Call Rules	
10/23/08	Citation issued to Admiral Air Conditioning regarding apparent violation of National Do-Not-Call Rules	
10/23/08	Citation issued to GMS, LLC regarding apparent violation of National Do-Not-Call Rules	
10/23/08	Citation issued to Pro Tech Inspection regarding apparent violation of National Do-Not-Call Rules	
10/16/08	Citation issued to Dri-Rite Carpet Cleaning regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
10/16/08	Citation issued to Future Energy Corporation, dba Energy Savers regarding apparent violation of National Do-Not-Call Rules	
10/16/08	Citation issued to Dri-Rite Carpet Cleaning regarding apparent violation of National Do-Not-Call Rules	
10/16/08	Citation issued to Future Energy Corporation, dba Energy Savers regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Physician Practice Network aka Practicelink regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Kensington Clock & Watch Repair aka Kensington Clock Repair regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to CNF Enterprises, Inc. dba D & L Distributing regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Centurion Stone regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Timeshare Travels, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Consumer Sales Solutions, LLC regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Golden Gate Opera regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Physician Practice Network aka Practicelink regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Kensington Clock & Watch Repair aka Kensington Clock Repair regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to CNF Enterprises, Inc. dba D & L Distributing regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Centurion Stone regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Consumer Sales Solutions, LLC regarding apparent violation of National Do-Not-Call Rules	
10/9/08	Citation issued to Golden Gate Opera regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to AGR Group regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to Qayyum, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to Fiber Clean, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to A. Arnold of Texas LLC regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to AGR Group regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to Qayyum, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/8/08	Citation issued to Fiber Clean, Inc. regarding apparent violation of National Do-Not-Call Rules	

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(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
10/8/08	Citation issued to A. Arnold of Texas LLC regarding apparent violation of National Do-Not-Call Rules	
10/7/08	Citation issued to Farmers Insurance of Dublin regarding apparent violation of National Do-Not-Call Rules	
10/7/08	Citation issued to Business Timeshares By Owner of Daytona Beach regarding apparent violation of National Do-Not-Call Rules	
10/7/08	Citation issued to Commonwealth Energy Systems, LLC regarding apparent violation of National Do-Not-Call Rules	
10/7/08	Citation issued to Farmers Insurance of Dublin regarding apparent violation of National Do-Not-Call Rules	
10/7/08	Citation issued to Business Timeshares By Owner of Daytona Beach regarding apparent violation of National Do-Not-Call Rules	
10/7/08	Citation issued to Commonwealth Energy Systems, LLC regarding apparent violation of National Do-Not-Call Rules	
10/2/08	Citation issued to Clear Creek Consulting regarding apparent violation of National Do-Not-Call Rules	
10/2/08	Citation issued to Clear Creek Consulting regarding apparent violation of National Do-Not-Call Rules	
10/2/08	Citation issued to Anne Cristaldi Realtor regarding apparent violation of National Do-Not-Call Rules	
10/2/08	Citation issued to Four Seasons Home Improvement Co. regarding apparent violation of National Do-Not-Call Rules	
10/2/08	Citation issued to Blue Fish Commodities, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/2/08	Citation issued to Northeast Funding Corporation regarding apparent violation of National Do-Not-Call Rules	
10/1/08	Citation issued to Champion Carpet Cleaners regarding apparent violation of National Do-Not-Call Rules	
9/30/08	Citation issued to Royale Crown Construction regarding apparent violation of National Do-Not-Call Rules	
9/30/08	Citation issued to West Park Direct regarding apparent violation of National Do-Not-Call Rules	
9/30/08	Citation issued to Good Faith Mortgage regarding apparent violation of National Do-Not-Call Rules	
9/29/08	Citation issued to Fenton Motors of El Dorado, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/26/08	Citation issued to Barber Coins and Collectibles regarding apparent violation of National Do-Not-Call Rules	
9/26/08	Citation issued to Barber Coins and Collectibles regarding apparent violation of National Do-Not-Call Rules	
9/26/08	\$10,000 Forfeiture proposed against Timeshare Register regarding violation of National Do-Not-Call Rules	
9/25/08	Citation issued to Health Benefits Direct Corporation regarding apparent violation of National Do-Not-Call Rules	
9/25/08	Citation issued to Health Benefits Direct Corporation regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
9/25/08	Citation issued to Aqua Clear Systems regarding apparent violation of National Do-Not-Call Rules	
9/23/08	Citation issued to Leisure Lawn, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/23/08	Citation issued to Terry L. Caudle regarding apparent violation of National Do-Not-Call Rules	
9/23/08	Citation issued to Leisure Lawn, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/23/08	Citation issued to Terry L. Caudle regarding apparent violation of National Do-Not-Call Rules	
9/19/08	Citation issued to U.S. Bancorp dba U.S. Bancorp Insurance Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/19/08	Citation issued to U.S. Bancorp dba U.S. Bancorp Insurance Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/19/08	Citation issued to Premier Termite & Pest Control regarding apparent violation of National Do-Not-Call Rules	
9/19/08	Citation issued to Capital Direct Lending Corporation dba I Capital Direct regarding apparent violation of National Do-Not-Call Rules	
9/19/08	Citation issued to Vulcan Waterproofing regarding apparent violation of National Do-Not-Call Rules	
9/15/08	Citation issued to Remax Commercial & Investment Realty regarding apparent violation of National Do-Not-Call Rules	
9/11/08	Citation issued to Home Center regarding apparent violation of National Do-Not-Call Rules	
9/5/08	Citation issued to A/C Super Center, LLC dba Expert Techs Air Conditioning & Heating regarding apparent violation of National Do-Not-Call Rules	
9/4/08	Citation issued to Southern California Construction Consultants aka S CA Construction Consultants regarding apparent violation of National Do-Not-Call Rules	
9/4/08	Citation issued to Southern California Construction Consultants aka S CA Construction Consultants regarding apparent violation of National Do-Not-Call Rules	
9/4/08	Citation issued to Cinamour Entertainment, LLC regarding apparent violation of National Do-Not-Call Rules	
9/3/08	Citation issued to On Assignment, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/3/08	Citation issued to On Assignment, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/3/08	Citation issued to Omnis Student Loans regarding apparent violation of National Do-Not-Call Rules	
9/3/08	Citation issued to Anit-Phone Gurad regarding apparent violation of National Do-Not-Call Rules	
9/2/08	Citation issued to The Restart Room dba Restart Solutions, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/2/08	Citation issued to The Restart Room dba Restart Solutions, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/2/08	Citation issued to Southland, aka Univ. of Phoenix, aka Apollo Group, Inc. regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
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<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
9/2/08	Citation issued to Clearview Construction regarding apparent violation of National Do-Not-Call Rules	
9/2/08	Citation issued to Vitana Financial Group, Inc., dba Direct Satellite Network Solutions regarding apparent violation of National Do-Not-Call Rules	
8/29/08	Citation issued to University Prep Center regarding apparent violation of National Do-Not-Call Rules	
8/29/08	Citation issued to Chim Chimney Sweep aka J.N. Chim Chimney Sweep Corporation regarding apparent violation of National Do-Not-Call Rules	
8/29/08	Citation issued to Cryptosage, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/28/08	Citation issued to Superior Mortgage Company regarding apparent violation of National Do-Not-Call Rules	
8/27/08	Citation issued to Chartered Marketing Services, Inc. aka Intersections, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/27/08	Citation issued to Chartered Marketing Services, Inc. aka Intersections, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/25/08	Citation issued to Compucredit Corporation regarding apparent violation of National Do-Not-Call Rules	
8/21/08	Citation issued to Energy Wise Home Improvement Systems regarding apparent violation of National Do-Not-Call Rules	
8/21/08	Citation issued to Energy Wise Home Improvement Systems regarding apparent violation of National Do-Not-Call Rules	
8/21/08	Citation issued to Sunland Property Group, LLC aka Sunland Property regarding apparent violation of National Do-Not-Call Rules	
8/21/08	Citation issued to Ideal Mortgage Corporation regarding apparent violation of National Do-Not-Call Rules	
8/19/08	Citation issued to 1st Choice Home Improvements regarding apparent violation of National Do-Not-Call Rules	
8/19/08	Citation issued to 1st Choice Home Improvements regarding apparent violation of National Do-Not-Call Rules	
8/19/08	Citation issued to Masters Green, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/18/08	Citation issued to Intersections, Inc. dba Chartered Marketing Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/18/08	Citation issued to Intersections, Inc. dba Chartered Marketing Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/18/08	Citation issued to Secured Financial Lending, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/18/08	Citation issued to CT Heating & Maintenance Services regarding apparent violation of National Do-Not-Call Rules	
8/15/08	Citation issued to Logan Equipment Group regarding apparent violation of National Do-Not-Call Rules	
8/15/08	Citation issued to Collegiate Carpet Service regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to Strategic Marketing Enterprise regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
8/14/08	Citation issued to Twin City Home Remodeling regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to Strategic Marketing Enterprise regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to Twin City Home Remodeling regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to Easy Mortgage, LLC regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to Tropical Travel Marketing regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to Arizona Estate Services regarding apparent violation of National Do-Not-Call Rules	
8/14/08	Citation issued to ECOMMERCE, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/13/08	Citation issued to Oasis Wealth Management, LLC aka Oasis Asset Planning, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/11/08	Citation issued to Mortgage Line Financial Corporation regarding apparent violation of National Do-Not-Call Rules	
8/11/08	Citation issued to The Carmon Group aka The Carmoon Group regarding apparent violation of National Do-Not-Call Rules	
8/7/08	Citation issued to Simply The Best Cooling dba Simply The Best Heating & Cooling, LLC regarding apparent violation of National Do-Not-Call Rules	
8/7/08	Citation issued to Simply The Best Cooling dba Simply The Best Heating & Cooling, LLC regarding apparent violation of National Do-Not-Call Rules	
8/7/08	Citation issued to ADK Marketing, aka ADK, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/7/08	Citation issued to Fitness World West regarding apparent violation of National Do-Not-Call Rules	
8/6/08	Citation issued to Total Emedical, Inc., aka Total e-Medical regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to Guitar Center regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to Chimney Sweep regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to Contractors Temporary Employment Service regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to Interstate Gutter Cleaning aka Interstate Gutter Cleaning Protektiv Services regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to Practice Builders, Inc. aka Patient Builders, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to California Mobile Home Services regarding apparent violation of National Do-Not-Call Rules	
8/4/08	Citation issued to Rescom Mortgage, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/31/08	Citation issued to Custom View Windows & Doors regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
7/16/08	Citation issued to Integrity Financial Services, Inc. aka IFS Marketing Group regarding apparent violation of National Do-Not-Call Rules	
7/1/08	Citation issued to Moreno Valley Pontiac GMC, Buick regarding apparent violation of National Do-Not-Call Rules	
6/30/08	Citation issued to Cannon Remodeling regarding apparent violation of National Do-Not-Call Rules	
6/30/08	Citation issued to SBA Capital Funding aka The Butler Corporation regarding apparent violation of National Do-Not-Call Rules	
6/26/08	Citation issued to Construction Concern, Inc. regarding apparent violation of National Do-Not-Call Rules	
6/24/08	Citation issued to Higher Response Marketing, Inc. regarding apparent violation of National Do-Not-Call Rules	
6/17/08	Citation issued to Wachovia - Golden West aka Wachovia Corporation regarding apparent violation of National Do-Not-Call Rules	
6/17/08	Citation issued to Wachovia - Golden West aka Wachovia Corporation regarding apparent violation of National Do-Not-Call Rules	
6/17/08	Citation issued to Hobson Air Conditioning & Heating regarding apparent violation of National Do-Not-Call Rules	
6/12/08	Citation issued to Appointments4You.com aka Rogers Management Group, LLC regarding apparent violation of National Do-Not-Call Rules	
6/11/08	Citation issued to Nevada State Corporate Network, Inc. regarding apparent violation of National Do-Not-Call Rules	
6/11/08	\$20,000 Forfeiture proposed against Timeshare Register regarding violation of National Do-Not-Call Rules	
6/5/08	Citation issued to Refi-Pal dba American Mortgage Group aka Coactive Financial Corp regarding apparent violation of National Do-Not-Call Rules	
6/4/08	Citation issued to Total Solutions Group regarding apparent violation of National Do-Not-Call Rules	
5/29/08	Citation issued to Countrywide Home Loans regarding apparent violation of National Do-Not-Call Rules	
5/29/08	Citation issued to Countrywide Home Loans regarding apparent violation of National Do-Not-Call Rules	
5/29/08	Citation issued to BCU Roofing regarding apparent violation of National Do-Not-Call Rules	
5/29/08	Citation issued to Home Saving Mortgage regarding apparent violation of National Do-Not-Call Rules	
5/27/08	Citation issued to Tri-State Mortgage Consultants, LLC regarding apparent violation of National Do-Not-Call Rules	
5/27/08	Citation issued to Elite Exteriors, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/27/08	Citation issued to All Seasons Company, Inc. aka All Seasons, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/27/08	Citation issued to T-Bar Resources, LLC regarding apparent violation of National Do-Not-Call Rules	
5/27/08	Citation issued to Nasca & Company, Inc. regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
5/27/08	Citation issued to Union Federal Mortgage Corporation regarding apparent violation of National Do-Not-Call Rules	
5/23/08	Citation issued to ALG Capital regarding apparent violation of National Do-Not-Call Rules	
5/23/08	Citation issued to Capital Business Services aka JNOM, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/13/08	Citation issued to Redwood Financial, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/13/08	Citation issued to First Fidelity Mortgage Group, Ltd. regarding apparent violation of National Do-Not-Call Rules	
5/13/08	Citation issued to Redwood Financial, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/12/08	Citation issued to Global Contact Services regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to Bristol Windows, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to Senior Advocate Insurance & Financial Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to John Rivera regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to Bristol Windows, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to Senior Advocate Insurance & Financial Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to John Rivera regarding apparent violation of National Do-Not-Call Rules	
5/9/08	Citation issued to West Interactive Corporation regarding apparent violation of National Do-Not-Call Rules	
5/8/08	Citation issued to RX Limited regarding apparent violation of National Do-Not-Call Rules	
5/7/08	Citation issued to Crown Financial Advisory, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/7/08	Citation issued to Crown Financial Advisory, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/6/08	Citation issued to Premier Wholesale Funding regarding apparent violation of National Do-Not-Call Rules	
5/6/08	Citation issued to MacSouth.Com regarding apparent violation of National Do-Not-Call Rules	
5/6/08	Citation issued to Premier Wholesale Funding regarding apparent violation of National Do-Not-Call Rules	
5/5/08	Citation issued to Construction aka United Builders & Design, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/5/08	Citation issued to Hobson Air Conditioning & Heating regarding apparent violation of National Do-Not-Call Rules	
5/5/08	Citation issued to Intero Real Estate/DRES, LLC regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
5/2/08	Citation issued to American Call Center Service, Inc. aka AMCCS, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/2/08	\$20,000 Forfeiture proposed against AZ Prime One Mortgage Corporation regarding violation of National Do-Not-Call Rules	
5/1/08	Citation issued to All American Alarms aka ALOL American Alarms regarding apparent violation of National Do-Not-Call Rules	
5/1/08	Citation issued to CPA Marketing, LLC dba Choose the Degree regarding apparent violation of National Do-Not-Call Rules	
5/1/08	Citation issued to Worldwidesavers.com regarding apparent violation of National Do-Not-Call Rules	
4/28/08	Citation issued to D & W Your Heating and Air Conditioning Specialists regarding apparent violation of National Do-Not-Call Rules	
4/25/08	Citation issued to Northeast Funding Corporation regarding apparent violation of National Do-Not-Call Rules	
4/24/08	Citation issued to Noon Lawn and Landscape Company regarding apparent violation of National Do-Not-Call Rules	
4/24/08	Citation issued to OZ Fitness Club regarding apparent violation of National Do-Not-Call Rules	
4/24/08	Citation issued to American Pacesetters Enterprises, L.L.C. regarding apparent violation of National Do-Not-Call Rules	
4/24/08	Citation issued to Legacy Entertainment, LLC dba Mantra Entertainment regarding apparent violation of National Do-Not-Call Rules	
4/21/08	Citation issued to Sierra Air Conditioning and Heating dba Sierra International regarding apparent violation of National Do-Not-Call Rules	
4/21/08	Citation issued to Freedom Air Conditioning, Plumbing, and Heating regarding apparent violation of National Do-Not-Call Rules	
4/21/08	Citation issued to Protection Source regarding apparent violation of National Do-Not-Call Rules	
4/11/08	Citation issued to Feature Films For Families regarding apparent violation of National Do-Not-Call Rules	
4/10/08	Citation issued to Efinancial, LLC. regarding apparent violation of National Do-Not-Call Rules	
4/9/08	Citation issued to National heating AC and Plumbing regarding apparent violation of National Do-Not-Call Rules	
4/9/08	Citation issued to Infinity Financial Consumer Services regarding apparent violation of National Do-Not-Call Rules	
4/3/08	Citation issued to CY Construction Company regarding apparent violation of National Do-Not-Call Rules	
4/3/08	Citation issued to Turn Key Solutions, Inc. regarding apparent violation of National Do-Not-Call Rules	
4/3/08	Citation issued to Superior Detection Systems regarding apparent violation of National Do-Not-Call Rules	
4/2/08	Citation issued to Galkos Construction, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/27/08	Citation issued to C & J Consulting regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
3/26/08	Citation issued to Pathway Financial, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/25/08	Citation issued to Southern Green Lawn Care regarding apparent violation of National Do-Not-Call Rules	
3/25/08	Citation issued to Goldman G M & Assocs. regarding apparent violation of National Do-Not-Call Rules	
3/20/08	Citation issued to FBK Products LLC regarding apparent violation of National Do-Not-Call Rules	
3/17/08	Citation issued to Energy Designer Homes Corporation regarding apparent violation of National Do-Not-Call Rules	
3/13/08	Citation issued to Detroit II Automobiles/Auto Liquidation Center regarding apparent violation of National Do-Not-Call Rules	
3/10/08	Citation issued to Ready Tool Company regarding apparent violation of National Do-Not-Call Rules	
3/5/08	Citation issued to Transcoastal Corporation regarding apparent violation of National Do-Not-Call Rules	
2/27/08	Citation issued to Convergys Corporation regarding apparent violation of National Do-Not-Call Rules	
2/19/08	Citation issued to The Summit Group of Utah, LLC dba The Success Team regarding apparent violation of National Do-Not-Call Rules	
2/15/08	\$10,000 Forfeiture proposed against AZ Prime One Mortgage Corporation regarding violation of National Do-Not-Call Rules	
2/4/08	Citation issued to Nelnet Corporation regarding apparent violation of National Do-Not-Call Rules	
1/21/08	Citation issued to Reader's Choice regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to Accurate Telemesssage Solutions regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to EverDry Waterproofing regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to Trion Properties IV, LLC aka Wilshire Equity Funding Group, Inc. regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to State Farm Insurance - Frank Fraulo Agency regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to Pro-Buy Equities Corporation aka Primary Funding Group regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to Patrick J. Foran aka Patk J. Foran regarding apparent violation of National Do-Not-Call Rules	
12/28/07	Citation issued to Autumn Air Heating & Cooling regarding apparent violation of National Do-Not-Call Rules	
12/27/07	Citation issued to Korners, LLC regarding apparent violation of National Do-Not-Call Rules	
12/26/07	Citation issued to Allstate Funding Corporation regarding apparent violation of National Do-Not-Call Rules	
12/21/07	Citation issued to T-Bar Resources, LLC regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
12/21/07	Citation issued to Pro Buy Equities dba Primary Funding Group regarding apparent violation of National Do-Not-Call Rules	
12/20/07	Citation issued to Jemstar Builders, Inc. regarding apparent violation of National Do-Not-Call Rules	
12/19/07	Citation issued to West Interactive Corporation regarding apparent violation of National Do-Not-Call Rules	
12/14/07	Citation issued to Fidelity National Mortgage Corporation regarding apparent violation of National Do-Not-Call Rules	
12/12/07	Citation issued to Redwood Financial, Inc. regarding apparent violation of National Do-Not-Call Rules	
12/11/07	Citation issued to First National Warranty, LLC regarding apparent violation of National Do-Not-Call Rules	
12/10/07	Citation issued to Quality Heating & Air Conditioning Company regarding apparent violation of National Do-Not-Call Rules	
12/10/07	Citation issued to JMS Enterprises, Inc. of Largo regarding apparent violation of National Do-Not-Call Rules	
12/7/07	Citation issued to Global Wholesale Lending regarding apparent violation of National Do-Not-Call Rules	
12/6/07	Citation issued to LPR Capital Corporation aka LPR Capitol Corporation regarding apparent violation of National Do-Not-Call Rules	
12/6/07	Citation issued to Happy Lawn Corporation regarding apparent violation of National Do-Not-Call Rules	
12/5/07	Citation issued to Jonathan Miller regarding apparent violation of National Do-Not-Call Rules	
12/3/07	Citation issued to Maritz, Inc. regarding apparent violation of National Do-Not-Call Rules	
12/3/07	Citation issued to Advanced Physicians Group regarding apparent violation of National Do-Not-Call Rules	
11/19/07	\$20,000 Forfeiture proposed against See Through Windows & Doors LLC regarding violation of National Do-Not-Call Rules	
11/16/07	Citation issued to Publishers Direct Service regarding apparent violation of National Do-Not-Call Rules	
11/15/07	Citation issued to Erie Construction Mid - West, Inc. regarding apparent violation of National Do-Not-Call Rules	
11/14/07	Citation issued to Yesco LLC aka Selig Construction regarding apparent violation of National Do-Not-Call Rules	
11/14/07	Citation issued to Barbara Kiefer regarding apparent violation of National Do-Not-Call Rules	
11/13/07	Citation issued to Jose L. Ramirez regarding apparent violation of National Do-Not-Call Rules	
11/13/07	Citation issued to Certified Maintenance Corporation regarding apparent violation of National Do-Not-Call Rules	
11/9/07	\$500,000 Consent Decree with NOS Communications, Inc. concerning National Do-Not-Call Registry rules and requirements	
11/7/07	Citation issued to American Student Loan Corporation regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
10/30/07	Citation issued to JDK Services, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/11/07	Citation issued to Let's Talk Health, Inc. regarding apparent violation of National Do-Not-Call Rules	
10/11/07	Citation issued to Prime One Mortgage Corporation regarding apparent violation of National Do-Not-Call Rules	
10/4/07	Citation issued to Fidelity Borrowing, LLC regarding apparent violation of National Do-Not-Call Rules	
9/28/07	Citation issued to Midwest Outdoor Resorts, Inc. aka Rushmore Shadows Resort regarding apparent violation of National Do-Not-Call Rules	
9/28/07	Citation issued to M & T Holdings LLC dba Premiere Mortgage regarding apparent violation of National Do-Not-Call Rules	
9/27/07	Citation issued to ICT Group, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/27/07	Citation issued to Best Carpet Cleaning regarding apparent violation of National Do-Not-Call Rules	
9/20/07	Citation issued to The Hot Lead Company LLC aka My Hot Leads LLC regarding apparent violation of National Do-Not-Call Rules	
9/20/07	Citation issued to Freedom Air Conditioning, Plumbing, & Heating, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/19/07	Citation issued to Davis Painting and Texture Coating dba Davis Home Improvements, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/19/07	Citation issued to Professional Medical Solutions regarding apparent violation of National Do-Not-Call Rules	
9/18/07	Citation issued to Supreme Air Systems, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/18/07	Citation issued to Dial America regarding apparent violation of National Do-Not-Call Rules	
9/18/07	Citation issued to Trendwest Resorts, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/18/07	Citation issued to Financial Strategies regarding apparent violation of National Do-Not-Call Rules	
9/13/07	Citation issued to Mack Diamond Energy, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/12/07	Citation issued to Merck & Co. Inc., dba Telerx Marketing, Inc. regarding apparent violation of National Do-Not-Call Rules	
9/5/07	Citation issued to Darren Perna regarding apparent violation of National Do-Not-Call Rules	
9/4/07	Citation issued to World Marketing Alliance dba Prime Time Window regarding apparent violation of National Do-Not-Call Rules	
9/4/07	Citation issued to Elite Mortgage & Real Estate regarding apparent violation of National Do-Not-Call Rules	
8/28/07	Citation issued to Adobe Carpet Cleaning regarding apparent violation of National Do-Not-Call Rules	
8/24/07	Citation issued to Gutter Helmet Of Michigan regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
8/23/07	Citation issued to Body Awareness, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/23/07	Citation issued to Landmark Merchant Solutions regarding apparent violation of National Do-Not-Call Rules	
8/23/07	Citation issued to 4 ThisHouse.com regarding apparent violation of National Do-Not-Call Rules	
8/21/07	Citation issued to Windows Unlimited regarding apparent violation of National Do-Not-Call Rules	
8/21/07	Citation issued to Summit Financial regarding apparent violation of National Do-Not-Call Rules	
8/21/07	Citation issued to Paramount Capital regarding apparent violation of National Do-Not-Call Rules	
8/21/07	Citation issued to Mass Exteriors, Inc. regarding apparent violation of National Do-Not-Call Rules	
8/21/07	Citation issued to Expedia Home Loans regarding apparent violation of National Do-Not-Call Rules	
8/21/07	Citation issued to Equity Mortgage Funding, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/20/07	Citation issued to Armor Guard Painting and Coating regarding apparent violation of National Do-Not-Call Rules	
7/20/07	Citation issued to Sunrise Service Association regarding apparent violation of National Do-Not-Call Rules	
7/20/07	Citation issued to Pacific Coast Carpet Cleaning regarding apparent violation of National Do-Not-Call Rules	
7/20/07	Citation issued to DCG Home Loans, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Strategia Marketing, LLC regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Vacation Tours & Travel, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Kirby Vacuum Company regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to White Glove Duct Cleaning regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Spotless Carpet Care regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to RL Remodeling, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Mantra Entertainment regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to John Shields regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Daniel Hawker dba Anything Goes Hauling Service regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to CTC Marketing regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
7/18/07	Citation issued to Coldwell Banker Prime Properties regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Ace Rug and Furniture Cleaning Company, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/18/07	Citation issued to Citicorp Mortgage regarding apparent violation of National Do-Not-Call Rules	
7/17/07	Citation issued to Front Royal Fitness Center regarding apparent violation of National Do-Not-Call Rules	
7/16/07	Citation issued to Primerica Financial Services regarding apparent violation of National Do-Not-Call Rules	
7/12/07	Citation issued to Professional Medical Solutions regarding apparent violation of National Do-Not-Call Rules	
7/10/07	Citation issued to M-Point Mortgage Services, LLC regarding apparent violation of National Do-Not-Call Rules	
7/6/07	Citation issued to Metro Remodeling regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Mortgage Capital Associates regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to LA Times regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Harden Construction/ THMG Marketing regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Prime Time Lending, Inc. regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Worldwidesavers Dot Com regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Universal Bancorp regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to National Consumer Services regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Orlando Investments, LLP/ dba Summer Bay Resorts regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Time Share International regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Shawn White regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Arizona Tele Broker dba Broadband Dynamics, LLC regarding apparent violation of National Do-Not-Call Rules	
7/5/07	Citation issued to Amtec Funding Group aka Novastar Mortgage regarding apparent violation of National Do-Not-Call Rules	
7/3/07	Citation issued to Prime One Mortgage regarding apparent violation of National Do-Not-Call Rules	
7/3/07	Citation issued to Nu-Look Cleaning & Restoration regarding apparent violation of National Do-Not-Call Rules	
7/3/07	Citation issued to Global Mortgage Funding, Inc. regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
7/2/07	Citation issued to Esbco Industries regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to Richard Goodale dba Direct Dish Sales regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to Interval Resorts I dba RiverPointe Napa Valley regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to ASAP Restoration regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to All Star Furnace, Duct & Chimney Cleaning Company regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to Statewide Financial Services regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to Original Services, dba Breeders Directory Inc., dba AAA Pets regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to J.P. Morgan Chase Bank regarding apparent violation of National Do-Not-Call Rules	
7/2/07	Citation issued to Mission Home Loan regarding apparent violation of National Do-Not-Call Rules	
6/29/07	Citation issued to Gutterguard of SC regarding apparent violation of National Do-Not-Call Rules	
6/27/07	Citation issued to Capital One Financial regarding apparent violation of National Do-Not-Call Rules	
6/27/07	Citation issued to Western Filtration, Inc. regarding apparent violation of National Do-Not-Call Rules	
6/27/07	Citation issued to US Gafachi regarding apparent violation of National Do-Not-Call Rules	
6/27/07	Citation issued to Tele-Ten Marketing regarding apparent violation of National Do-Not-Call Rules	
6/26/07	Citation issued to Liberty Construction/ Fargo Marketing & Management regarding apparent violation of National Do-Not-Call Rules	
6/26/07	Citation issued to ALG Capital regarding apparent violation of National Do-Not-Call Rules	
6/26/07	Citation issued to Microvoice Applications, Inc. regarding apparent violation of National Do-Not-Call Rules	
6/26/07	Citation issued to Residential Lending regarding apparent violation of National Do-Not-Call Rules	
6/25/07	Citation issued to United Air Temp regarding apparent violation of National Do-Not-Call Rules	
6/22/07	Citation issued to Equity Freedom Corp. regarding apparent violation of National Do-Not-Call Rules	
6/22/07	Citation issued to Citizens Community Bank regarding apparent violation of National Do-Not-Call Rules	
6/15/07	Citation issued to Town and Country Foods regarding apparent violation of National Do-Not-Call Rules	
6/15/07	Citation issued to Defender Securities aka Defender Security Company regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
6/15/07	Citation issued to Creative Lending Group regarding apparent violation of National Do-Not-Call Rules	
6/14/07	Citation issued to American Collegiate Financial Services regarding apparent violation of National Do-Not-Call Rules	
6/12/07	Citation issued to Timberland Mortgage Services regarding apparent violation of National Do-Not-Call Rules	
6/8/07	Citation issued to The Smith Company regarding apparent violation of National Do-Not-Call Rules	
6/6/07	Citation issued to Freedom Cash Financial regarding apparent violation of National Do-Not-Call Rules	
6/5/07	Citation issued to All Sports & Collectibles aka Warrior Custom Golf regarding apparent violation of National Do-Not-Call Rules	
6/4/07	Citation issued to Soft Touch regarding apparent violation of National Do-Not-Call Rules	
6/4/07	Citation issued to Galaxie Lumber regarding apparent violation of National Do-Not-Call Rules	
6/1/07	Citation issued to Alliance Healthcare LLC regarding apparent violation of National Do-Not-Call Rules	
5/31/07	Citation issued to Affordable Health Care Solutions regarding apparent violation of National Do-Not-Call Rules	
5/31/07	Citation issued to AOL Time Warner Inc. (AOL Broadband) regarding apparent violation of National Do-Not-Call Rules	
5/30/07	Citation issued to Interactive Male regarding apparent violation of National Do-Not-Call Rules	
5/29/07	Citation issued to Timeshare Register Group, LLC regarding apparent violation of National Do-Not-Call Rules	
5/25/07	Citation issued to Southwest Mortgage Resources LLC regarding apparent violation of National Do-Not-Call Rules	
5/23/07	Citation issued to Christopher Conception c/o Johnny Air Cargo regarding apparent violation of National Do-Not-Call Rules	
5/23/07	Citation issued to Building America regarding apparent violation of National Do-Not-Call Rules	
5/22/07	Citation issued to Dakota Asset Management dba SMC Direct regarding apparent violation of National Do-Not-Call Rules	
5/16/07	Citation issued to The Daily News regarding apparent violation of National Do-Not-Call Rules	
5/15/07	Citation issued to Mar Theatre regarding apparent violation of National Do-Not-Call Rules	
5/14/07	Citation issued to Metro Marketing regarding apparent violation of National Do-Not-Call Rules	
5/14/07	Citation issued to Randolph Lee regarding apparent violation of National Do-Not-Call Rules	
5/14/07	\$748,000 Forfeiture issued against Dynasty Mortgage, L.L.C. regarding violation of National Do-Not-Call Rules	1
5/10/07	Citation issued to Dynamak regarding apparent violation of National Do-Not-Call Rules	

Appendix C

FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
5/10/07	Citation issued to United Global Technologies, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/10/07	Citation issued to Fargo Marketing & Management, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/7/07	Citation issued to Inphonex.com regarding apparent violation of National Do-Not-Call Rules	
5/7/07	Citation issued to Touch Asia Outsourcing Solutions, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/3/07	Citation issued to Regional Telemarketing regarding apparent violation of National Do-Not-Call Rules	
5/2/07	Citation issued to Care Free Homes, Inc. regarding apparent violation of National Do-Not-Call Rules	
5/2/07	Citation issued to People's Products regarding apparent violation of National Do-Not-Call Rules	
5/2/07	Citation issued to Prime One Mortgage Corporation regarding apparent violation of National Do-Not-Call Rules	
5/2/07	Citation issued to Wizard Enterprises, Ltd. regarding apparent violation of National Do-Not-Call Rules	
4/26/07	Citation issued to Priority Air, LLC regarding apparent violation of National Do-Not-Call Rules	
4/19/07	Citation issued to Certified Security Systems regarding apparent violation of National Do-Not-Call Rules	
4/19/07	Citation issued to Charlotte Observer regarding apparent violation of National Do-Not-Call Rules	
4/19/07	Citation issued to The Painting Pros, LLC regarding apparent violation of National Do-Not-Call Rules	
4/13/07	Citation issued to Maxim Group regarding apparent violation of National Do-Not-Call Rules	
4/9/07	Citation issued to Elephant Group Satellite Sales CP regarding apparent violation of National Do-Not-Call Rules	
4/6/07	Citation issued to Quicken Loans regarding apparent violation of National Do-Not-Call Rules	
4/6/07	Citation issued to Household International, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/2/07	Citation issued to Five Star Remodeling, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/2/07	Citation issued to Quality Heating & Air Conditioning regarding apparent violation of National Do-Not-Call Rules	
3/2/07	Citation issued to United Air Temp regarding apparent violation of National Do-Not-Call Rules	
3/2/07	Citation issued to United Chimney Corp. regarding apparent violation of National Do-Not-Call Rules	
3/1/07	Citation issued to Columbia House Holdings, Inc. regarding apparent violation of National Do-Not-Call Rules	
3/1/07	Citation issued to Three Brothers Moving & Storage, Inc. regarding apparent violation of National Do-Not-Call Rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
2/28/07	Citation issued to Westgate Resorts, Ltd. regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to Graham Heating & Air Conditioning, Inc. regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to AZ Prime One Mortgage Corp. regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to Care Free Homes, Inc. regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to Combined Agency, Inc. regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to Global Alarms, Inc. regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to Great Biz Sites regarding apparent violation of National Do-Not-Call Rules	
2/28/07	Citation issued to Bankers Life and Casualty Company regarding apparent violation of National Do-Not-Call Rules	
2/27/07	Citation issued to Evergreen Auto Glass regarding apparent violation of National Do-Not-Call Rules	
2/5/07	Citation issued to National Consumer Services aka Fidelity Credit Services regarding apparent violation of National Do-Not-Call Rules	
2/5/07	Citation issued to Federated Merchant Solutions regarding apparent violation of National Do-Not-Call Rules	
11/23/05	\$100,000 Consent Decree with T-Mobile USA, Inc. concerning National Do-Not-Call Registry rules and requirements	
5/3/05	Citation issued to Direct Merchant's Credit Card Bank, N.A., Phoenix, Arizona for failure to honor the FCC's National Do Not Call rules	
3/11/05	Citation issued to American Express Company for violation of the FCC National Do-Not-Call Registry rules and requirements	
3/1/05	\$770,000 forfeiture proposed against Dynasty Mortgage, L.L.C. regarding apparent violation of National Do-Not-Call Rules	
1/19/05	Citation issued to American First Mortgage Company, Anaheim, California for failure to honor the FCC's National Do Not Call rules	
10/27/04	Citation issued to Equity One, Marlton, New Jersey for failure to honor the FCC's National Do Not Call rules	
9/7/04	\$400,000 Consent Decree with Primus Telecommunications, Inc. concerning National Do-Not-Call Registry rules and requirements	
7/9/04	\$490,000 Consent Decree with A.T.&T. Corp. concerning company-specific Do-Not-Call requirements and related matters	
7/6/04	Citation issued to BLS Funding, Jericho, New York for failure to honor the FCC's National Do Not Call rules	
7/2/04	Citation issued to See Through Windows & Doors LLC, Landover and Rockville, Maryland for failure to honor the FCC's National Do Not Call rules	
6/4/04	Citation issued to Planet Mortgage Corporation, San Diego, California for failure to honor the FCC's National Do Not Call rules	
5/28/04	Citation issued to Fresh Start Financial, Van Nuys, California for failure to honor the FCC's National Do Not Call rules	

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FCC Enforcement Documents Related to Unwanted Robocalls
(in Reverse Chronological Order)

<u>Date</u>	<u>Document</u>	<u>Forfeiture</u>
5/17/04	Citation issued to Key Financial Corporation, Largo, Florida for failure to honor the FCC's National Do Not Call rules	
3/31/04	Citation issued to American Standard Mortgage, Cincinnati, OH for failure to honor the FCC's National Do Not Call rules	
2/12/04	Citation issued to Mortgage Concepts, Inc., a.k.a. L.M.A. Marketing, Inc., New Smyrna Beach, FL for failure to honor the FCC's National Do Not Call rules	
1/30/04	Citation issued to L.A.P. Holdings, LLC, a.k.a. First Finance, Tempe, Arizona for failure to honor the FCC's National Do Not Call rules	
1/12/04	Citation issued to Nations Mortgage, Coral Springs, Florida for failure to honor the FCC's National Do Not Call rules	
12/22/03	Citation issued to Ban-Cor a.k.a. Ban-Cor Mortgage, Ontario, California for failure to honor the FCC's National Do Not Call rules	
12/22/03	Citation issued to Cactus Cash, Inc., Phoenix, Arizona for failure to honor the FCC's National Do Not Call rules	
12/22/03	Citation issued to Debt Masters, Grand Terrace, California for failure to honor the FCC's National Do Not Call rules	
12/22/03	Citation issued to Dynasty Mortgage, Phoenix, Arizona for failure to honor the FCC's National Do Not Call rules	
12/18/03	Citation issued to CPM Funding, Inc., Irvine, California, for failure to honor the FCC's National Do Not Call rules	
12/12/03	Citation issued to Time-Life, Inc., Alexandria, VA for violation of the TCPA and Commission's rules regarding honoring do not call requests and transmitting prerecorded unsolicited advertisements to residential telephone lines	
11/3/03	\$780,000 Forfeiture proposed against AT&T Corporation for apparent violations of the Commission's Company-Specific Do-Not-Call rules.	
10/28/03	Citation issued to Commercial Consultants, Raleigh, NC for violation of the TCPA and Commission's rules regarding honoring do not call requests and transmitting prerecorded unsolicited advertisements to residential telephone lines	
9/10/03	Citation issued to Discovery Marketing & Distributing, Inc. for violations of the TCPA and Commission's rules regarding transmitting prerecorded unsolicited advertisements to residential telephone lines and honoring do not call requests	
6/26/03	Nationwide Do-Not-Call Registry authorized by FCC. Consumers Now Have Easy Option to Eliminate Telemarketing Calls	